

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Civil Action No. 3:22-5887 (RK)(JTQ)

JOHN DOE,

Plaintiff,

vs.

REMOTE VIDEOTAPED

DEPOSITION OF:

KATHLEEN DEIGNAN

PRINCETON UNIVERSITY,

Defendants.

TRANSCRIPT of the stenographic notes of the
proceedings in the above-entitled matter, as
taken by and before RITA GARDNER, a Notary
Public and Certified Court Reporter of the State
of New Jersey, held REMOTELY VIA ZOOM, on
Friday, November 8, 2024, commencing at 9:33
a.m.

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1 the charges that this person has been found
2 responsible for?

3 A. The former. We would look at the --
4 we would look at the full context in which these
5 cases are not alike. They are all very
6 different. They are all very -- very fact
7 specific, and so we would look at the context,
8 the full context before we would impose a
9 sanction.

10 Q. And then when you are comparing them
11 to the other case precedents, are you looking at
12 the specific facts of those other cases or are
13 you just looking at here is another case where
14 somebody has been found responsible for the same
15 charge?

16 MR. DAILEY: Objection as to form.

17 A. No, we would look at the facts of
18 other cases and look at these -- at the case in
19 front of us and say, "Do we think there were
20 factors in this particular case that made the
21 charges seem more or less serious?"

22 BY MS. BLASEY:

23 Q. So you had access to the case files
24 of all of cases of the precedence that you were
25 looking at?

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1 A. We did.

2 Q. Okay. Did you consider your opinion
3 about the strength of the evidence in the case
4 that you were determining the sanction for?

5 A. No. That was not our role. We --
6 we accepted the findings of the Panel and our job
7 started at that point going forward. So we did
8 not go back and sort of second guess, if that is
9 the right word, or put on our own spin on the
10 facts that the Panel had determined.

11 Q. Got it. Was it always you and Cole
12 Crittenden on every case determining the
13 sanction?

14 A. Yes.

15 Q. So there were no other people that
16 could have been put on the sanctioning panel?

17 A. No.

18 Q. And how -- how many times would you
19 and Cole meet before issuing a final sanction?

20 A. Once.

21 Q. Did you ever meet more than once?

22 A. It is possible that we met more than
23 once, but that would have been atypical.

24 Q. Did you ever meet with anyone other
25 than Cole before issuing a sanction?